

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE: : **CHAPTER 7**
CHARLES A. BUDZINA :
: **CASE NO.: 1:18-bk-04574-HWV**

**MOTION BY DEBTOR/ MOVANT TO CONVERT
FROM CHAPTER 7 CASE TO CHAPTER 13 CASE**

AND NOW COMES, Charles A. Budzina, Debtor/Movant, by and through his attorneys, Jacobson, Julius & Harshberger, and aver the following:

1. This bankruptcy case was commenced by a petition filed by Debtors/Movants under Chapter 13 of the United States Bankruptcy Code on October 29, 2018.
2. Debtors/Movants' filing was motivated for typical reasons including a pending repossession and credit card debt. Debtor is not eligible to directly convert his Chapter 13 case to a Chapter 7.
3. Debtor seeks to reconvert back to Chapter 13.
4. Debtor/Movant hereby file this conversion pursuant to 11 U.S.C. § 706(a) to convert his Chapter 7 case to a case under Chapter 13.
5. All schedules and statements as well as the documents will be filed and any amendments to current documents will be filed in ten (10) days.

WHEREFORE, Debtors/Movants requests that this case be converted to Chapter 13 of the Bankruptcy Code.

Dated: June 15, 2020

s/Chad J. Julius
Chad J. Julius
ID # 209496
Attorney for Debtor/Movant

VERIFICATION

I, Charles A. Budzina, Debtor/Movant in the foregoing conversion, certify under penalty of perjury that the foregoing is true and correct.

s/Charles A. Budzina 6/12/2020

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CERTIFICATE OF SERVICE

I, Colleen Reed, paralegal with the Jacobson, Julius & Harshberger, hereby certify that I have served a copy of the foregoing *Motion to Convert Case to Chapter 13* on the following person(s) by CM/ECF or by depositing a true and correct copy in the United States Mail, Postage Prepaid addressed to:

CHARLES J. DEHART III ESQUIRE
CHAPTER 13 TRUSTEE
dehartstaff@pamd13trustee.com; harrisburgect@ramapo.com

U.S. TRUSTEE
228 WALNUT STREET, SUITE 1190
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Leon P. Haller
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s/Colleen Reed
Colleen Reed, Paralegal
Jacobson, Julius & Harshberger
8150 Derry Street
Harrisburg, PA 17111
717.909.5858
FAX: 717.909.7788

Dated: June 15, 2020

**IN THE UNITED STATES BANKRUPTCY COURT
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IN RE:	: CHAPTER 13
CHARLES A. BUDZINA	:
	: CASE NO.: 1:18-bk-04574-HWV

ORDER

Upon consideration of Debtor's Motion to convert pursuant to 11 U.S.C. §706(a), it is hereby ORDERED that the Debtor's Chapter 7 case is converted to a case under 11 U.S.C. §1301 *et. seq.* It is further ORDERED that the Chapter Seven Trustee, Leon P. Haller, be and is discharged.